

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

RETAIL ACCESS OPTIMIZATION
INITIATIVE, 2011

DOCKET NO. N2011-1

DAVID B. POPKIN MOTION

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Respectfully submitted,

N20111MOTION3

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On August 19, 2011, the Postal Service filed its NOTICE OF THE UNITED STATES POSTAL SERVICE which appears to serve the purpose of establishing Library Reference USPS-LR-N2011-1/4 which appears to be the public version of Library Reference USPS-LR-N2011-1/NP1.

This filing consisted of nine separate PDF computer files. The Commission's website does not show a Library Reference 4 apparently because there does not appear to be a Library Reference 4 other than the statement in the last sentence of the Notice. Since there are no real headings on the various documents, I will reference them by the order that they appear in the Commission's Daily Listing.

Obviously, I do not have access to the non-public document which is referenced to as being replaced. There are a total of 3459 pages. Until the Postal Service responds to those subparts of Interrogatory DBP/USPS-62 which specifically refer to the categories or information, if any, that were redacted in the public document, it is not possible to fully evaluate Library Reference 4.

Document #9 appears to indicate that Library Reference NP1 contains listings containing latitude/longitude data. Library Reference 4 in Documents #1 through #8 does not show any reference to latitude/longitude data.

The Postal Service should either provide the latitude/longitude data contained in Library Reference NP1 or provide the redacted version along with the justification for non-public treatment as required by Commission Rule 3007.21

Examination of Library Reference 4 indicates that Finance Numbers have been redacted. The Postal Service has not provided the justification for non-public treatment as required by Commission Rule 3007.21.

Until the Postal Service provides the justification for non-public treatment as required by Commission Rule 3007.21, it is not possible to evaluate the validity of their action and make a meaningful motion for reversing their action. The Postal Service must take the initial step.